

Franklyn Friday  
701 Linden Dr.  
Louisville, Ky. 40223

RECEIVED

DEC 14 9 45 AM '01

12/13/01

K.R.E.F.

Rosemary Center  
KY Registry of Election Finance  
140 Walnut St.  
Frankfort, KY 40601

Dear Ms. Center:

I am currently a member of the Jefferson County Republican Executive Committee. The opinion I would like to procure would apply to a fund raising opportunity currently being studied by that particular committee.

Specifically, this executive committee would like to sell newspaper subscriptions, much as it sells other political paraphernalia- hats, pins, etc., that is, by buying wholesale and selling retail. The newspaper company involved, which is an independent business enterprise, offers its various subscription agents and wholesalers the same "mark up" it would permit the executive committee. It is contemplated the executive committee would offer subscriptions for sale to its donors, receive the retail price from those donors, and pay the newspaper company the wholesale price for the commensurate subscriptions. No money would be paid by the newspaper company to the executive committee; only from the committee to the company.

My question then:

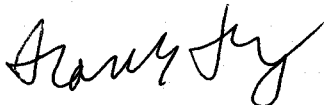
**May an executive committee offer for sale to its contributors a newspaper subscription for a standard retail price while procuring this subscription at a lower standard wholesale price, and thus profiting on the difference?**

Also-

**Would the answer above apply any differently to a PAC in place of an executive committee?**

Thank you for your time and I shall be happy to provide any further information you may require.

Sincerely,



Franklyn Friday